

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

PUSH DATA LLC,

Plaintiff,

v.

SIX CONTINENTS HOTELS, INC., d.b.a.
IHG Hotels & Resorts,

Defendant.

Civil Action No. 4:20-cv-00785-ALM

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO STAY ALL DEADLINES
AND NOTICE OF SETTLEMENT**

Plaintiff Push Data LLC (“Plaintiff” or “Push Data”) and Defendant Six Continents Hotels, Inc., d.b.a. IHG Hotels & Resorts (“Defendant” or “IHG”) have reached a settlement-in-principle in the above-referenced action and are in the process of negotiating and finalizing a written settlement agreement memorializing the settlement-in-principle.

Accordingly, the parties jointly ask that the Court stay all pending deadlines between them, so that the parties may finalize the terms of the settlement agreement without incurring additional expenses and file appropriate dismissal papers with the Court. Plaintiff makes this motion with the consent of Defendant, who has not yet formally appeared in this action.

Dated: May 4, 2021

DEVLIN LAW FIRM LLC

/s/ Timothy Devlin

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 4th day of May, 2021.

/s/ Timothy Devlin

Timothy Devlin